



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TH/MKP
F.#2017R01840

271 Cadman Plaza East
Brooklyn, New York 11201

July 31, 2018

By ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG) (S-1)

Dear Judge Garaufis:

The government respectfully submits this letter to request that the enclosed stipulation and order concerning discovery materials be so-ordered by the Court. The proposed stipulation and order has been signed by counsel for defendants Keith Raniere, Clare Bronfman, Allison Mack, Lauren Salzman, and Nancy Salzman, in counterparts, for the Court's consideration.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Tanya Hajjar
Moira Kim Penza
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cc: Clerk of the Court (NGG) (by ECF)
Defense Counsel (By ECF)